

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE UNIVERSITY OF WASHINGTON, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

CASE NO. 2:18-cv-01396-BJR

STIPULATED MOTION TO
EXTEND TIME TO REPLY AND
ORDER

JOINT STIPULATION

Plaintiffs THE UNIVERSITY OF WASHINGTON, the CENTER FOR HUMAN RIGHTS AT THE UNIVERSITY OF WASHINGTON, and ANGELINA GODOY (collectively “the UWCHR”), filed the above-captioned lawsuit under the Freedom of Information Act (the “FOIA”) against Defendants DEPARTMENT OF HOMELAND SECURITY (“DHS”), IMMIGRATION AND CUSTOMS ENFORCEMENT (“ICE”), and CUSTOMS AND BORDER PROTECTION (“CBP”) (collectively “Defendants”) seeking the disclosure of certain documents related to the federal government’s treatment of undocumented immigrants in the state of Washington. In the last status report, the parties requested a briefing schedule to resolve the remaining open FOIA request between UWCHR and ICE. Dkt. No. 35,

1 Joint Status Report, at 3. Pursuant to this request, the Court issued a briefing schedule
2 requiring UWCHR's motion to be filed by February 14, 2020; ICE's response to be filed by
3 March 2, 2020; and UWCHR's reply by March 9, 2020. Dkt. No. 36, Order. UWCHR timely
4 filed its motion to compel. Dkt. No. 37. The parties stipulated to extend time on February 27,
5 2020 (Dkt. No. 38) and ICE timely filed its response brief on March 13, 2020 (Dkt. Nos. 40-
6 41).

7 The parties have continued to confer since the Court's last extension and still believe a
8 resolution of this issue may be possible without the need for additional judicial intervention.
9 However, to do so, the parties need to continue discussions concerning the scope of ICE's
10 potential ability to produce information UWCHR sought in their FOIA request concerning I-
11 213s. The parties believe they may be able to achieve additional clarity on this point and a
12 potential resolution before the filing of additional briefing, but need additional time to do so.
13 The parties therefore jointly request that the Court extend UWCHR's filing deadline for a reply
14 brief from March 20, 2020 to March 30, 2020. The parties also ask that the noting date be
15 extended to April 5, 2020. If a resolution is reached, UWCHR shall withdraw the motion to
16 compel.
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18 Accordingly, the parties hereby STIPULATE AND AGREE, AND JOINTLY
19 REQUEST that the Court extend UWCHR's time to file a reply brief to March 30, 2020.
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1 **SO STIPULATED.**

2 Dated this 18th day of March, 2020.

3 Respectfully submitted,
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5 Special Assistant Attorneys General

6 By /s/ Jordan Clark

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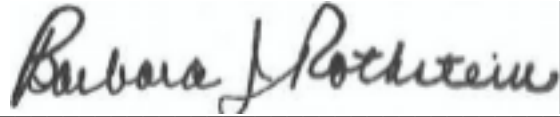
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23 *Attorneys for Defendants*

ORDER

The Parties having so stipulated and agreed, the Court hereby ORDERS that UWCHR'S reply brief is due no later than March 30, 2020.

DATED this 19th day of March, 2020.

A handwritten signature in black ink, reading "Barbara J. Rothstein", is positioned above a horizontal line.

DISTRICT JUDGE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT COURT